

STATE OF SOUTH CAROLINA

(Caption of Case)

South Carolina Telephone Coalition Petition to
Modify Alternative Regulation Plans Filed Pursuant
to S.C. Code Section 58-9-576(B) to Take Into
Account Recent Action by the Federal
Communications Commission

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

COVER SHEET

DOCKET

NUMBER: 2013 - 55 - C

SC PUBLIC SERVICE
COMMISSION

2013 AUG - 5 PM 3:01

RECEIVED

(Please type or print)

Submitted by: John M. S. Hoefer, Esquire

SC Bar Number: 2549

Address: P.O. Box 8416
Columbia, SC 29202-8416

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NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition ☒ Request for item to be placed on Commission's Agenda expeditiously

☐ Other:

INDUSTRY (Check one)

NATURE OF ACTION (Check all that apply)

- | | | | |
|--|--|---|--|
| <input type="checkbox"/> Electric | <input type="checkbox"/> Affidavit | <input type="checkbox"/> Letter | <input type="checkbox"/> Request |
| <input type="checkbox"/> Electric/Gas | <input type="checkbox"/> Agreement | <input type="checkbox"/> Memorandum | <input type="checkbox"/> Request for Certification |
| <input type="checkbox"/> Electric/Telecommunications | <input type="checkbox"/> Answer | <input type="checkbox"/> Motion | <input type="checkbox"/> Request for Investigation |
| <input type="checkbox"/> Electric/Water | <input type="checkbox"/> Appellate Review | <input type="checkbox"/> Objection | <input type="checkbox"/> Resale Agreement |
| <input type="checkbox"/> Electric/Water/Telecom. | <input type="checkbox"/> Application | <input type="checkbox"/> Petition | <input type="checkbox"/> Resale Amendment |
| <input type="checkbox"/> Electric/Water/Sewer | <input type="checkbox"/> Brief | <input type="checkbox"/> Petition for Reconsideration | <input type="checkbox"/> Reservation Letter |
| <input type="checkbox"/> Gas | <input type="checkbox"/> Certificate | <input type="checkbox"/> Petition for Rulemaking | <input type="checkbox"/> Response |
| <input type="checkbox"/> Railroad | <input type="checkbox"/> Comments | <input type="checkbox"/> Petition for Rule to Show Cause | <input type="checkbox"/> Response to Discovery |
| <input type="checkbox"/> Sewer | <input type="checkbox"/> Complaint | <input type="checkbox"/> Petition to Intervene | <input type="checkbox"/> Return to Petition |
| <input checked="" type="checkbox"/> Telecommunications | <input type="checkbox"/> Consent Order | <input checked="" type="checkbox"/> Petition to Intervene Out of Time | <input type="checkbox"/> Stipulation |
| <input type="checkbox"/> Transportation | <input type="checkbox"/> Discovery | <input type="checkbox"/> Prefiled Testimony | <input type="checkbox"/> Subpoena |
| <input type="checkbox"/> Water | <input type="checkbox"/> Exhibit | <input type="checkbox"/> Promotion | <input type="checkbox"/> Tariff |
| <input type="checkbox"/> Water/Sewer | <input type="checkbox"/> Expedited Consideration | <input type="checkbox"/> Proposed Order | <input type="checkbox"/> Other: Annual Report |
| <input type="checkbox"/> Administrative Matter | <input type="checkbox"/> Interconnection Agreement | <input type="checkbox"/> Protest | |
| <input type="checkbox"/> Other: | <input type="checkbox"/> Interconnection Amendment | <input type="checkbox"/> Publisher's Affidavit | |
| | <input type="checkbox"/> Late-Filed Exhibit | <input type="checkbox"/> Report | |

WILLOUGHBY & HOEFER, P.A.

ATTORNEYS & COUNSELORS AT LAW

930 RICHLAND STREET

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COLUMBIA, SOUTH CAROLINA 29202-8416

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SC PUBLIC SERVICE
COMMISSION

AREA CODE 803
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MITCHELL M. WILLOUGHBY
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ELIZABETH ZECK*
ELIZABETHANN LOADHOLT CARROLL
CHAD N. JOHNSTON
JOHN W. ROBERTS

*ALSO ADMITTED IN TX

August 5, 2013

VIA HAND DELIVERY

The Honorable Jocelyn G. Boyd
Interim Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, South Carolina 29210

RE: Petition of the South Carolina Telephone Coalition to Modify Alternative Regulation Plans Filed Pursuant to S.C. Code Section 58-9-576 (B) to Take Into Account Recent Action by the Federal Communications Commission
Docket No. 2013-55-C

Dear Mrs. Boyd:

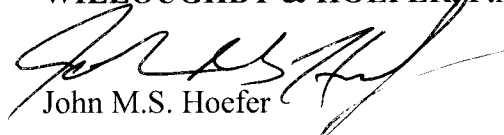
Enclosed for filing please find the original and two (2) copies of a Petition to Intervene in the above-referenced matter on behalf of Verizon Long Distance LLC, Verizon Select Services, Inc., MCI Communications Services, Inc. and MCImetro Access Transmission Services LLC. Please accept the original for filing and acknowledge your receipt of same by returning one of the copies to me, bearing your file-stamp, via our courier.

By copy of this letter, we are serving a copy of this filing on all parties of record and enclose a Certificate of Service to that effect.

If you have any questions, or need additional information, please do not hesitate to contact me. With best regards, I am

Sincerely,

WILLOUGHBY & HOEFER, P.A.


John M.S. Hoefer

JMSH/sw
Enclosures

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

DOCKET NO. 2013-55-C

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2013 AUG -5 PM 3:01

SC PUBLIC SERVICE
COMMISSION

Re: Petition of the South Carolina Telephone)
Coalition to Modify Alternative Regulation) PETITION TO INTERVENE
Plans Filed Pursuant to S.C. Code Section) OUT OF TIME
58-9-576(B) to Take Into Account Recent)
Action by the Federal Communications)
Commission.)
_____)

Verizon Long Distance LLC, Verizon Select Services Inc., MCI Communications Services, Inc. and MCImetro Access Transmission Services LLC (hereinafter collectively referred to as the "Verizon Entities") hereby petition pursuant to 10 S.C. Code Ann. Regs. 103-825(2012), to intervene in the above-captioned proceeding, and in support thereof would respectfully show unto this Honorable Commission as follows:

1. The Verizon Entities hold various certificates of public convenience and necessity from the Commission to provide telecommunications services within the State of South Carolina. The Verizon Entities pay into the South Carolina Universal Service Fund which, as a result of a recently filed motion of the South Carolina Cable Television Association ("SCTA"), may be affected by the outcome of this proceeding. Accordingly, the Verizon Entities have an interest in this proceeding.

2. The authorized representatives of the Verizon Entities in this proceeding are the undersigned.

3. The Verizon Entities have not yet developed a position on the issues in this proceeding.

7/15/13

4. Granting the petition of the Verizon Entities will not cause any undue delay and will not prejudice the any party in this proceeding.

5. The participation of the Verizon Entities will assist the Commission in developing a full and fair record to address issues arising from this proceeding and is therefore consistent with the Commission's goal of full public participation on matters before it affecting the public interest.

WHEREFORE the Verizon Entities respectfully request:

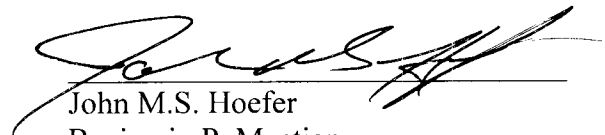
A. That this Petition be granted and that they be allowed to intervene as formal parties of record in this proceeding;

B. That they be allowed full participation in this proceeding to take such positions as they deem advisable, and

C. That such other and further relief be granted as is just and proper.

Respectfully submitted,

WILLOUGHBY & HOEFER, P.A.



John M.S. Hoefer
Benjamin P. Mustian
Willoughby & Hoefer, P.A.
Post Office Box 8416
Columbia, SC 29202-8416
803-252-3300

Attorneys for the Verizon Entities

Columbia, South Carolina
This 5th day of August, 2013

gust #2

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

DOCKET NO. 2013-55-C

RECEIVED
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SC PUBLIC SERVICE
COMMISSION

Re: South Carolina Telephone Coalition Petition)
to Modify Alternative Regulation Plans)
Filed Pursuant to S.C. Code Section)
58-9-576(B) to Take Into Account Recent)
Action by the Federal Communications)
Commission.)
_____)

CERTIFICATE OF SERVICE

This is to certify that I have caused to be served this day, the **Petition to Intervene Out of Time** filed by Verizon Long Distance LLC, Verizon Select Services, Inc., MCI Communications Services, Inc., and MCIMetro Access Transmission Services LLC by placing a copy of same in the care and custody of the United States Postal Service, with proper first-class postage affixed hereto and addressed as follows:

M. John Bowen, Jr., Esquire
Margaret M. Fox, Esquire
McNair Law Firm, P.A.
P.O. Box 11390
Columbia, South Carolina 29202

Nanette S. Edwards, Esquire
Office of Regulatory Staff
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Elliott & Elliott, P.A.
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Frank Rogers Ellerbe, III, Esquire
Bonnie D. Shealy, Esquire
Robinson McFadden & Moore, PC
P.O. Box 944
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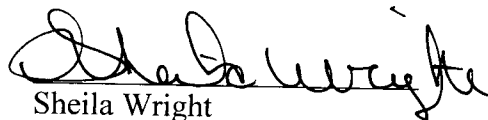
Patrick W. Turner, Esquire
BellSouth Telecommunications, LLC d/b/a AT&T South Carolina
1600 Williams Street, Suite 5200
Columbia, South Carolina 29201

C. Jo Anne Wessinger Hill, Esquire
Steven W. Hamm, Esquire
Richardson Plowden and Robinson, P.A.
Post Office Drawer 7788
Columbia, South Carolina 29202

Jeanne W. Stockman, Esquire
United Telephone Company of the Carolinas, LLC
d/b/a CenturyLink
14111 Capital Boulevard
Mailstop: NCWKFR0313
Wake Forest, North Carolina 27587

John J. Pringle, Jr., Esquire
1501 Main Street, Suite 500
Columbia, South Carolina 29201

Burnet R. Maybank, III, Esquire
Nexsen Pruet, LLC
P.O. Drawer 2426
Columbia, South Carolina 29202


Sheila Wright

This 5th day of August, 2013
Columbia, South Carolina